

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond) Division

In Re: Tamara Sue Crews

Case No. 14-35243-KLP
Chapter 13

HOUSEHOLD REALTY CORPORATION (HSBC Consumer Lending Mortgage Services, Servicer)

vs.

Tamara Sue Crews, Debtor

Respondents

NOTICE OF OBJECTION TO DEBTOR'S CHAPTER 13 PLAN
AND HEARING THEREON
Real Property at 11955 Mountain Laurel Drive, Richmond, Virginia 23236-2549

HOUSEHOLD REALTY CORPORATION (HSBC Consumer Lending Mortgage Services, Servicer) herein, has filed papers with the court objecting to debtor's chapter 13 plan. Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

The hearing is scheduled for December 10, 2014 at 11:10 a.m. at Judge Phillips' Courtroom, 701 E. Broad St., Rm. 5100, Richmond, Virginia.

DATE: December 1, 2014

/s/ Justina Martynaityte, Esq. [jm]

Attorney for Movant
312 Marshall Avenue, Suite 800
Laurel, MD 20707
301-490-1196
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Bar No. 86858

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed, first class, postage prepaid, on December 1, 2014, to Tamara Sue Crews at 11955 Mountain Laurel Drive, Richmond, Virginia 23236-2549. Copies were sent electronically via the CM/ECF system to Nnika E. White, Attorney for Debtor and Carl M. Bates, Trustee.

/s/ Justina Martynaityte, Esq.

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OBJECTION BY SECURED CREDITOR TO PROPOSED PLAN

Comes now the secured creditor, HOUSEHOLD REALTY CORPORATION (HSBC Consumer Lending Mortgage Services, Servicer), which holds a Deed of Trust secured by the Debtor's real property at 11955 Mountain Laurel Drive, Richmond, Virginia 23236-2549, by and through its attorney, Justina Martynaityte, Esq., and objects to the proposed plan and to confirmation and for reason therefore states as follows:

1. The Debtor has proposed a plan which includes a total payment of \$0.00 for arrearages owed to HOUSEHOLD REALTY CORPORATION (HSBC Consumer Lending Mortgage Services, Servicer). The plan is not sufficiently funded to pay this amount or the correct amount of arrearages as noted below.

2. The secured creditor HOUSEHOLD REALTY CORPORATION (HSBC Consumer Lending Mortgage Services, Servicer) anticipates filing a Proof of Claim with pre-petition arrearages due in the approximate amount of \$77,751.26.

3. The plan as proposed by the Debtor would therefore be insufficient to pay the claim of HOUSEHOLD REALTY CORPORATION (HSBC Consumer Lending Mortgage Services, Servicer).

Wherefore the Secured Creditor prays this court to enter an Order

1. Denying confirmation of the proposed Chapter 13 Plan, or alternatively
2. Modifying the Chapter 13 Plan to provide for payment in full of the Claim filed by the secured creditor, or alternatively

3. For such other and further relief as the Court deems appropriate.

Respectfully submitted:

/s/ Justina Martynaityte, Esq. [jm]
Attorney for HOUSEHOLD REALTY
CORPORATION (HSBC Consumer Lending
Mortgage Services, Servicer)
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301-490-1196
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/s/ Justina Martynaityte, Esq.